

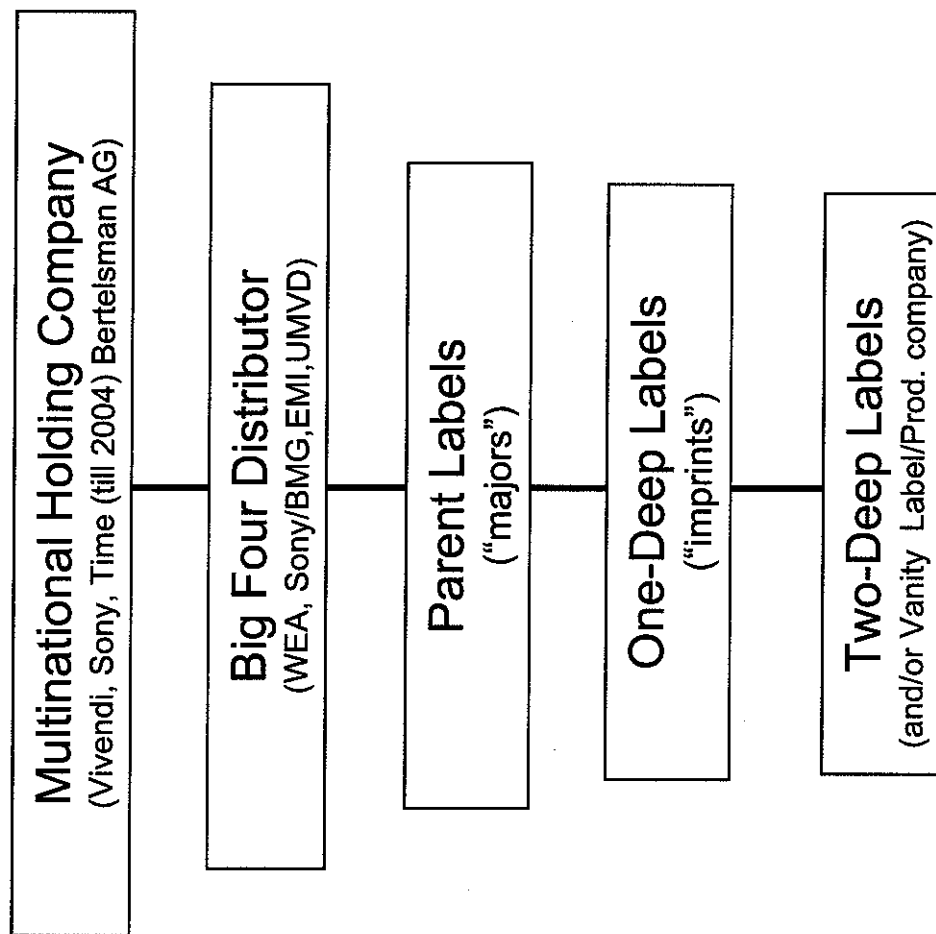
SUPPORTING DOCUMENTS for:

**T.E.A.M. Entertainment Inc. v. Douglas, et al.
A Comparison of the Sony/Noontime Relationship to the
Universal Music/Murder, Inc. Relationship**

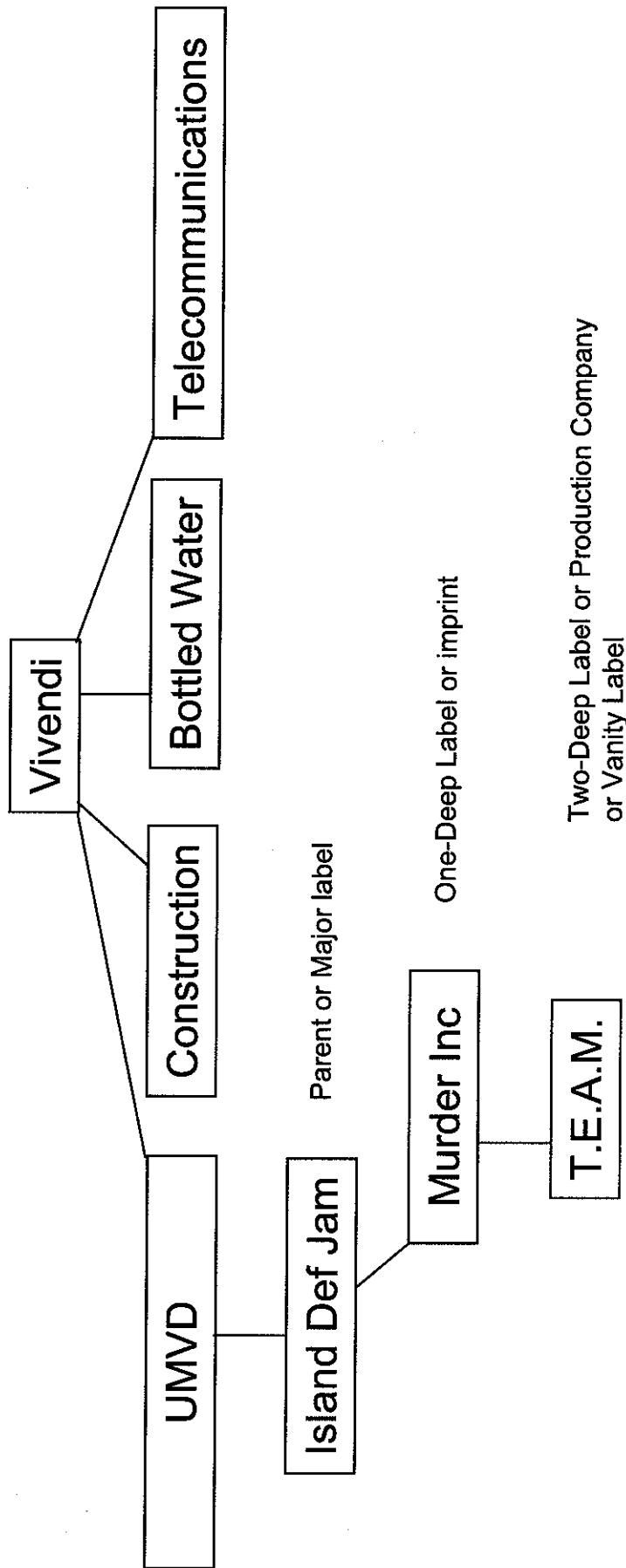
Prepared for Doman Davis LLP by:



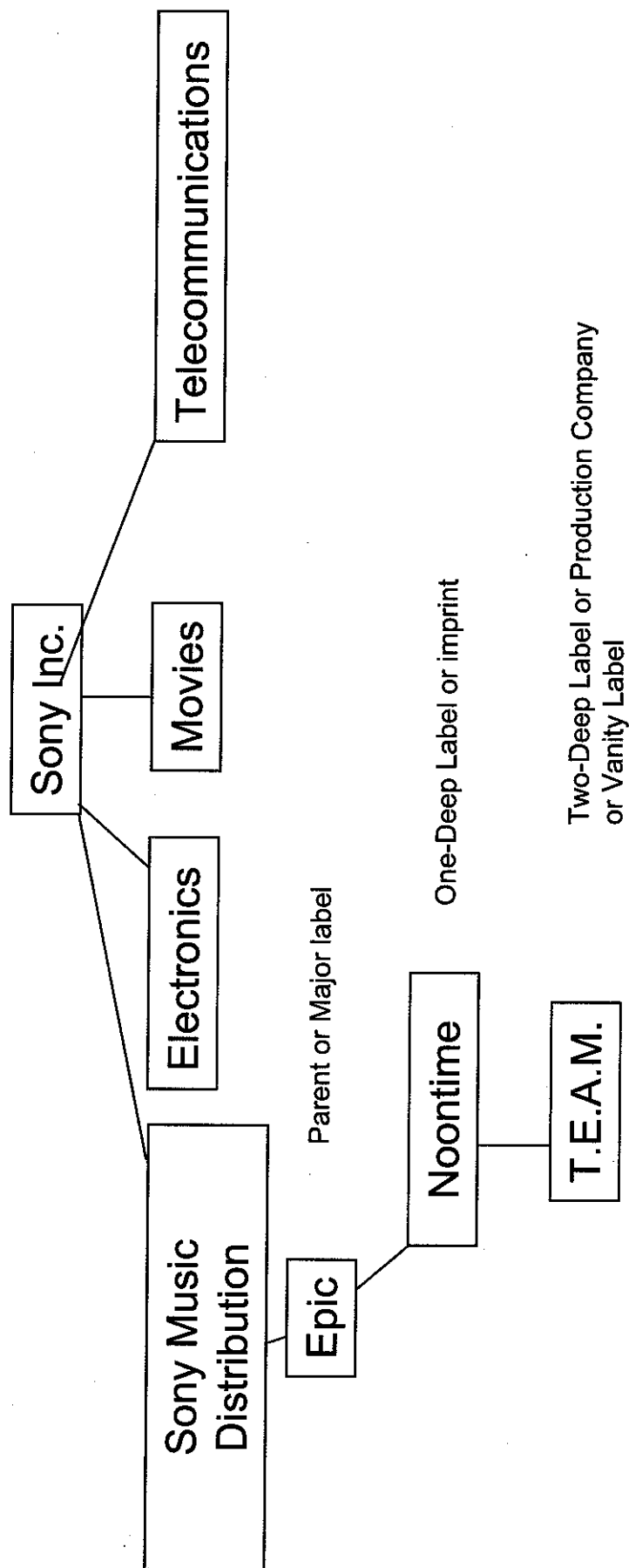
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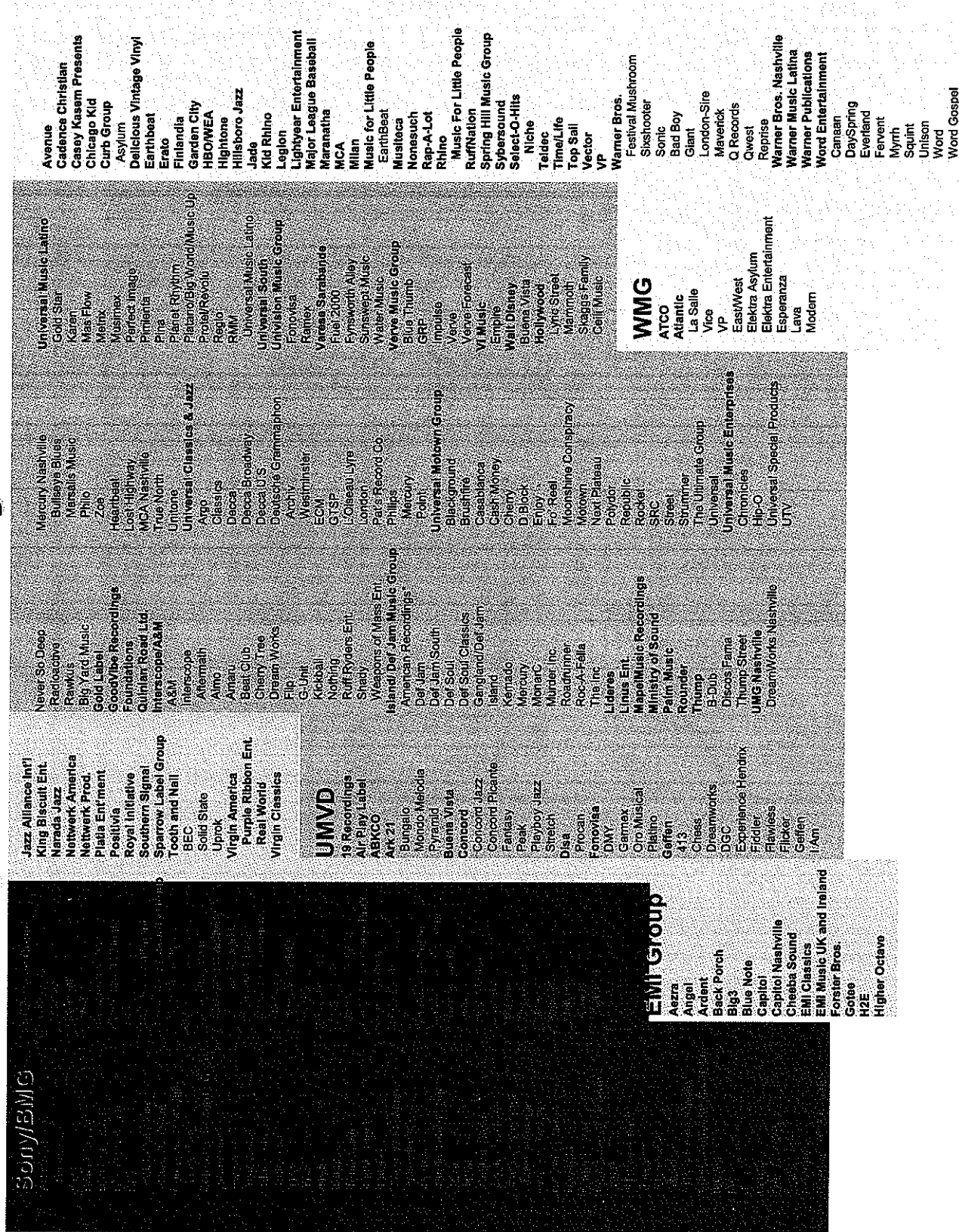
Family Tree UMVD



Family Tree Sony



Big Four Family Tree



“The Majors” (2005)

UMVD

Geffen
A&M
Interscope
American Recordings
Def Jam
Island
Roadrunner
Mercury Nashville
Lost Highway
Motown
Universal
Universal Music Latino
Univision
Fonovisa
Verve
Hollywood

WMG

Atlantic
Rhino
Warner
Bros.
Bad Boy
Reprise

Sony/BMG

BNM
Arista Nashville
RCA Nashville
Columbia Nashville
Columbia
Epic
J Records
RCA
Sony Classical
Sony Discos
Jive
Zomba

EMI Group

Angel
Blue Note
Capitol
Capitol Nashville
Virgin America

...and a few Indies

Disney
Wind-Up
Madacy
Curb
TVT
Koch
Razor & Tie

EMI Group PLC

Real Name: Electric and Musical Industries

Approximate 2004 sales: \$1.9 Billion

Software &

Manufacturing

Toshiba-EMI Ltd. (55%)

Motion Pictures

C&L Marketing

Music Division

EMI Music Publishing
EMI Music Distribution

Aezra	Nettwerk Prod.
Angel	Platia Ent'ment
Ardent	Positiva
Back Porch	Royal Initiative to Combat
Big3	AIDS
Blue Note	Southern Signal
Capitol	Sparrow Label Group
Capitol Nashville	Tooth and Nail
Cheeba Sound	BEC
EMI Classics	Solid State
EMI Music UK and Ireland	Uprok
Forster Bros.	Virgin America
Gotee	Purple Ribbon Ent.
H2E	Real World
Higher Octave	Virgin Classics
Jazz Alliance Int'l	
King Biscuit Ent.	
Narada Jazz	
Nettwerk America	Abbey Road Studios

Warner Music Group & WEA

Purchased for \$2.4 Billion in 2005

Warner Strategic Marketing

ATCO
Avenue
Cadence Christian
Casey Kasem Presents
Chicago Kid
Curb
Asylum
Delicious Vinyl
Earthbeat
Erato
Finlandia
Garden City
HBO/WEA
Hightone
Hillsboro Jazz
Jade
Kid Rhino
Legion
Lightyear Entertainment
Major League Baseball
Maranatha

MCA
Milan
Musiteca
Nonesuch
Rap-A-Lot
Rhino
Music For Little People
EarthBeat
RuffNation
Spring Hill Music Group
Sybersound
Select-O-Hits
Niche
Teldec
Time/Life
Top Sail
Vector
VP

Warner Group

Warner Bros.
Festival Mushroom
Sixshooter
Sonic
Giant
London-Sire
Maverick
Q Records
Qwest
Reprise
Warner Bros. Nashville
Warner Music Latina
Warner Publications
Word Entertainment
Word
Word Gospel
Myrrh
Squint
Everland
Unison
DaySpring
Canaan

Atlantic Group

Atlantic
La Salle
Vice
VP
East/West
Elektra Asylum
Elektra Entertainment
Esperanza
Lava
Modern

Approximate 2004 Sales: \$7.5 Billion

Bottled Water
(\$51 million)

Vivendi North America
Co. Sierra Spring Water
Co. Culligan Int.
Co. Everpure US
Filter Arrowhead Danco
Div. Davis Porcelains Mcallen
Pip & Supply Aqua
Alliance Metcalf &
Eddie's Sengram Beverages co.

**Telecommunications/Media
/Games
(\$2 Billion)**

Canal
Canal Satellite
VUP Investima
Aprovia
Edition Nathan
Edition Bordes
Usine Nouvelle
L'Action Municipale
Librairie Larousse

NEC/Unit (Joint)
Universal Studios
Radar Pictures
Universal Amphitheatre
Universal Pictures
Focus Features
History Channel
Sci-Fi Channel
Wet n' Wild
USA Networks
A&E Networks
Biography Magazine
Womps Bar & Grill
Vivendi Universal Games
Blizzard
Knowledge Adventure
Sierra Ent.
Dynamik Inc.
Papirus Racing

Cogebel SA

SECA
Paralene Cable
SECA
TV SportMonte Carlo TMC
Tele+

Construction
(\$1.4 Billion)

Compagnie
Generale Des
Eaux
Campenon
Bernard
Sade

Music
3.6 Billion
% owners

(\$3.6 Billion)
(90% ownership)

UMVG Distribution

[illegible]

Sony Corporation

Approximate 2004 Sales: \$34 Billion

Home Audio & Video Games (\$2.3 Billion) <ul style="list-style-type: none"> Sony Computer Columbia TriStar Home Video Sony Play Station Psygnosis Limited Sony Online Jeopardy Online Wheel of Fortune Columbia Tri-Star Interactive 	Theaters (\$4.3 Billion) <ul style="list-style-type: none"> Loews Cineplex Cineplex Odeon Demille Theatre Meltron 	Electronics (\$13 Billion) <ul style="list-style-type: none"> Avia Sony Electronics Sony/ATV Tree Pub. Acuff-Rose Pub Sony Computer Ent. Sony Professional Sony Mobile Electronics Digital Audio Disk Corp. Sony-Wega GmbH Euroheli Corp InterTrust Tech. 	Movies & TV (\$10 Billion) <ul style="list-style-type: none"> Sony Pictures Ent. Columbia TriStar Motion Pictures/TV Tall Trees Woodridge Prod. Telemundo Network Jim Henson Pro Mandalay Ent. Phoenix Pictures Hualong Film Digital Sony Broadband Ent. 	Insurance & Financial (\$3 Billion) <ul style="list-style-type: none"> Sony Life Insurance Company Sony Finance International 	Music (\$2 Billion) <ul style="list-style-type: none"> Sony Music Columbia House Music Club RED Dist. (\$9 Mill) Sony Music Ent. Sony/BMG Sales Group
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Columbia Records Group <ul style="list-style-type: none"> Avantgarde Aware Axis Music Backgammon Columbia DAS DMP DV8 Earshot EatnMusic Eight Rights Facility Music World Music Nashville Star Portrait Purple Ribbon Ent Rise RPM Sensational Signal To Noise Sucka Free/Loud Velvet Hammer We The People 	Epic Records Group <ul style="list-style-type: none"> Epic Hidden Beach Integrity Noontime Ruthless The Ultimate Group Epic/Monument Nashville 	RCA Music Group <ul style="list-style-type: none"> J Records Octone Roswell RCA 	Sony Classical <ul style="list-style-type: none"> Columbia Broadway Masterworks Essential Classics Great Performances Odyssey Sony Classical Voliator 	Sony/BMG Group <ul style="list-style-type: none"> ARTISTdirect Radar ATO BMG Classics BMG Heritage BMG U.S. Latin BNA Arista Nashville RCA Nashville Columbia Nashville Luck Dog Crescent Moon Daylight Dancing Cat ILLwill Iso 	Zomba Label Group <ul style="list-style-type: none"> GospoCentric Jive Jive Electro LaFace Pepper Silverstone Verity Violater Volcano Zomba 	Sony/BMG Sales Group <ul style="list-style-type: none"> Legacy One Records Open Wide Provident Razor & Tie Ent Reactor/Excess Reincarnate Music RLG Robbin's Entment Sanctuary Records Group RAS Records SMG Sony Discos Sony Norte Sony Tropical Sony Music Soundtrax Sony Wonder Time Bomb V2 Wind-Up Entment
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Bertelsmann AG

Approximate 2004 Sales: \$11.6 Billion

Publishing \$7.44 Billion

Gruner + Jahr AG & Co
G & J U.S.A. (US version)
 American HomeStyle &
 Gardening
 Child Magazine
 The Family Circle
 Fast Company
 Fitness
 Inc.com
 Parents Expecting
 Rosie (formerly McCall's)
 Women's Magazines
 Group
Beginner Books
 Pantheon Books
 Random House
 Adult Trade Schocken
 Books
 Times Books
 Villard Books
 Ballantine Publishing
 Group
Bantam-Dell Group
 Adapt electronic
 Publishing
 Bonanza Books
 Harmony Books
 Julian Press
 Alfred A. Knopf Inc.
 Protland House
Clarkson N. Potter Inc.
 BookSpan

Newbridge
 Crown
 Dell Publishing
 Delta
 Doubleday
 S.I.C.
 Laidlaw Brothers
 Mfrs. Parents
 Magazine
 Sonpress Inc.
 Transworld
 Publishers
 Bantam Books
 Corgi Books
Brown Printing Co.
 BCA
Mondadori S.p.A.
 Springer-Verlag
 GmbH & Co
Mosaik Verlag
 Verlag
Reis-und Verkehrs
 Verlag
Schulverlag Vieweg
Bertelsmann
 Lexikothrk
Bertelsmann Club
Albrecht Knaus Verlag
Wilhelm Goldmann Verlag
Friedrich Vieweg & Sohn
Westdeutscher Verlag
 Deutscher Preee
 Vetreieb
 Buchhasa
 Manager Magazin
 Verlagsgesellschaft
 Morgenpost Druck &
 Verlagsanataft

TV & Radio \$3.6 Billion

Ufa Film und
 Fernseh
RTL Group
 TV
 Channel 5
 (London)
 Fun TV
 RTL TV
 TMC
 TPS
 Teva
 VCF
 Multivision
 Premier
RTLRadio
 Atlantic 252
 Bandit 105.5
 Berliner Rundfun
FM Radio Network
 (Germany)
 Fun Radio
 Klassik Radio
 NSR
 104.6 RTL
 Radio Hamburg
 Radio NRW
 Bel RTL
 Radio Contact
 DTS
 ENEX
 Infomedia

Sony/BMG Sales Group \$1.1 Billion (50% interest - See Sony)

Internet
 \$340 million
 CDNow
 BarnesandNoble.com
 MyPlay Inc.
 Napster.com

What is the Difference between a Production Company a Major Label and a Distributor?

	Develops Talent	Has direct link to Distribution	Can Market and Promote	Has direct link to Retail
Production Company	X	—	—	—
Major Record Label	—	X	X	—
Distribution Company	—	—	X	X

Only 4 companies have the resources to do it all on a mass scale.

They are known as *"The Big Four"*

Market Share Statistics Form SoundScan 2005 for Sony/BMG and UMVD

2005 YEAR-TO-DATE RECORD COMPANY MARKET SHARE (1/03/05 - 1/01/06)
(reflects the market share for the entire entity including sub-distributed companies)

TOTAL ALBUMS (Catalog & Current Titles)

	<u>2005</u>	<u>2004</u>
UMVD	31.71%	29.59%
BMG	11.78%	15.20%
SONY	15.67%	14.62%
<u>SONYBMG Total</u>	27.45%	29.82%
WEA	17.28%	16.27%
EMD	10.38%	10.91%
OTHERS	13.18%	13.41%

CURRENT ALBUMS

	<u>2005</u>	<u>2004</u>
UMVD	34.82%	32.17%
BMG	13.16%	17.74%
SONY	14.55%	13.55%
<u>SONYBMG Total</u>	27.71%	31.29%
WEA	16.02%	14.56%
EMD	9.21%	10.32%
OTHERS	12.24%	11.65%

DIGITAL TRACKS

	<u>2005</u>	<u>2004</u>
UMVD	33.27%	30.76%
BMG	13.22%	14.74%
SONY	13.39%	15.48%
<u>SONYBMG</u>	26.61%	30.22%
WEA	18.26%	16.07%
EMD	7.84%	8.42%
OTHERS	14.02%	14.53%

% IN MARKET SHARE

Interscope/Dream Works	7.03
Universal Records Group	4.41
Island	3.67
Geffen	2.77
Def Jam	2.40
A&M	1.64
Roadrunner	0.89
Rounder	0.30
Lost Highway	0.16

TOTAL TITLES IN TOP 200

UMG	77
Other	56

BILLBOARD TOP 200 BY LABEL

Def Jam	18
Interscope	16
Universal	14
Motown	7
A&M	5
Geffen	5
Island	4
Cash Money	4
Dreamworks	2
Blackground	2
Steve Rinkoff Company	2
Universal Music Enterprises	1

All charts on this page
from 2006 SoundScan
Data

Legend

UMG (Green)
OTHER (White)

Sales Statistics for Top Female R&B Artists **On Both Sony/BMG and UMVD**

(All data from SoundScan reports week ending 6/23/06)

ASHANTI (UNI/IDJ)

	TW Sales	YTD Sales	2004	2005	RTD Sales
Total	1097	70903	760223	498187	6264829
3 Albums					

BEYONCE (SONY/BMG/COLUMBIA)

	TW Sales	YTD Sales	2004	2005	RTD Sales
Total	2779	95246	1574744	317027	4516986
1 Album					

DESTINY'S CHILD (SONY/BMG/COLUMBIA)

	TW Sales	YTD Sales	2004	2005	RTD Sales
Total	5018	436280	1990289	2238386	16446448
6 Albums					

JENNIFER LOPEZ (SONY/BMG/EPIC)

	TW Sales	YTD Sales	2005	2004	RTD Sales
Total	1146	37219	807180	16815	11310902
	5 Albums			5	

ALICIA KEYS (SONY/BMG/J)

	TW Sales	YTD Sales	2005	2004	RTD Sales
Total	3258	215057	1394570	2355353	11318955
	3 Albums				

CIARA (SONY/BMG/LA FACE)

	TW Sales	YTD Sales	2005	2004	RTD Sales
Total	1948	86603	1531069	969120	2586792
	1 Album				

MARY J BLIGE (UNI/GEFFEN - UPTOWN/MCA)

	TW Sales	YTD Sales	2005	2004	RTD Sales
Total	23692	1655313	1169396	406624	18127875
	9 Albums				

CHRISTINA MILIAN (UNI/IDJ)

Total	2 Albums	TW Sales	6840	YTD Sales	115333	2004	2005	2004	RTD Sales
						356754	24624		497113

RIHANNA (UNI/IDJ)

Total	2 Albums	TW Sales	58236	YTD Sales	648186	2004	2005	2004	RTD Sales
						357115	0		1005301

Comparisons of Artists on Sony to UMVD

Taking the top four female R&B artists on both Sony and Universal the chart below shows the total average number of album sales for each title. The gross number in column 3 ("total sales") is divided by number of albums for each artist in column 2 ("# of albums") to achieve the number in column 4 "average per album."

The numbers in column 4 are then added up and divided by number of artists from each label respectively (4) to achieve the final numbers below in "Overall Average." This shows a "level playing field" of what the top four female R&B artists all selling albums to the same demographic and at the same time period achieved terms of average number of album sales per album for each major distributor. Although this statistic is based only on album sales and does not include singles videos and other formats, its conclusion is nonetheless obvious and unarguable: **the top female R&B artists on Sony/BMG labels consistently sell almost three-times as many records per album title than their relative equivalents on UMVD labels.**

artist	# of albums	total sales	average per album	label
RIHANNA	2	1,005,301	502,650.5	UMVD/IDJ
CHRISTINA MILIAN	2	497,113	248,556.5	UMVD/IDJ
MARY J BLIGE	9	18,127,875	2,014,208	UMVD/GEFFEN
ASHANTI	3	6,264,829	2,088,278	UMVD/IDJ
BEYONCE/DEST CH.	7	20,963,434	2,994,776	SONY/BMG/COL
JENNIFER LOPEZ	5	11,310,902	2,262,180	SONY/BMG/EPIC
ALICIA KEYS	3	11,318,955	3,772,985	SONY/BMG/J
CIARA	1	2,586,792	2,586,792	SONY/BMG/LA FACE

<u>Overall Average</u>	2,904,183
Sony/BMG:	1,213,423.2
UMVD:	

Same analysis with Beyonce as a solo artist only.

artist	# of albums	total sales	average per album	label
RIHANNA	2	1,005,301	502,650.5	UMVD/IDJ
CHRISTINA MILIAN	2	497,113	248,556.5	UMVD/IDJ
MARY J BLIGE	9	18,127,875	2,014,208	UMVD/GEFFEN
ASHANTI	3	6,264,829	2,088,278	UMVD/IDJ
BEYONCE	1	4,516,986	4,516,986	SONY/BMG/COL
JENNIFER LOPEZ	5	11,310,902	2,262,180	SONY/BMG/EPIC
ALICIA KEYS	3	11,318,955	3,772,985	SONY/BMG/J
CIARA	1	2,586,792	2,586,792	SONY/BMG/LA FACE

Overall Average	
Sony/BMG:	3,284,736
UMVD:	1,213,423.2